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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his
guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado; C.S., a minor by
and through his guardian ad litem Elsa
Acosta, individually and as successor-
in-interest to William Salgado; J.S., a
minor by and through her guardian ad
litem Elsa Acosta, individually and as
successor-in-interest to William
Salgado; M.S., a minor by and through
her guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

**Case No. 2:23-cv-09412-CBM-AGR
(Consolidated with Case No. 2:24-cv-
04898-CBM-AGR)**

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**NOTICE OF CONDITIONAL
SETTLEMENT AND REQUEST TO
VACATE ALL DATES**

1 Plaintiffs,

2 v.

3 CITY OF HUNTINGTON PARK;
4 NICK NICHOLS; RENE REZA;
5 MATTHEW RINCON; APRIL
6 WHEELER; and DOES 5 through 10,
7 inclusive,

8 Defendants.

9 WILLIAM OMAR CASTILLO
10 MIRANDA, an individual and as
11 Successor in Interest for Decedent,
12 WILLIAM RENE SALGADO
13 MIRANDA; JUANA MARIA
14 MIRANDA, an individual and as
15 Successor in Interest for Decedent,
16 WILLIAM RENE SALGADO
17 MIRANDA; OSMAR ANTONIO
18 CASTILLO BLANDON, a minor by
19 and through Guardian ad litem,
20 EUGENIA GUADELUPE ESPINOZA
21 SALMERON; EUGENIA
22 GUADELUPE ESPINOZA
23 SALMERON, an individual; KARLA
24 VANESSA BLANDON, an individual,

25 Plaintiffs,

26 v.

27 CITY OF HUNTINGTON PARK;
28 RENE REZA, an individual; APRIL
 WHEELER, an individual; MATTHEW
 RINCON, an individual; NICK
 NICHOLS, an individual; JOSE A.
 YAMASAKI, an individual; SAUL
 RODRIGUEZ, an individual; and
 DOES 1 TO 10, inclusive,

 Defendants.

TO THE HONORABLE COURT:

Plaintiffs D.S., C.S., J.S., and M.S. (“*Salgado* Plaintiffs”); Plaintiffs William Omar Castillo Miranda, Juana Maria Miranda, Osmar Antonio Castillo Blandon, Eugenia Guadalupe Espinoza Salmeron, and Karla Vanessa Blandon (“*Miranda* Plaintiffs”); and Defendants City of Huntington Park, Rene Reza, April Wheeler, Matthew Rincon, Nick Nichols, Jose A. Yamasaki, and Saul Rodriguez (“Defendants”), by and through their respective attorneys of record, hereby inform the Court of their conditional settlement of this entire consolidated matter, and respectfully request that the Court vacate all dates in this matter as the parties finalize their settlement, and stipulate as follows.

WHEREAS, on April 3, 2025, the parties participated in a mediation with ADR Panel Mediator Richard Copeland.

WHEREAS, on May 16, 2025, following the mediation and continued cooperation between Mr. Copeland and counsel for all parties, the pertinent authorities for the City of Huntington Park approved a proposed settlement to resolve both of these consolidated cases in their entirety.

WHEREAS, following this approval, a stipulation for settlement has been circulated by Mr. Copeland and has been executed by all parties and counsel except, as of the time of this filing, the representative for the City of Huntington Park. Given upcoming deadlines in this case, the parties wish to make the Court aware of the approval of the settlement and are content to have the remaining dates and deadlines vacated based on the settlement.

WHEREAS, the parties respectfully request that all dates and deadlines be vacated based on the parties’ settlement of the entire action.

WHEREAS, the parties further request that the Court maintain jurisdiction over this action for sixty (60) days to allow time for the parties to consummate the terms of the settlement, including execution of the release agreement and payment of the settlement funds, and for the parties to subsequently file a stipulated dismissal

1 of the action with prejudice. The parties further request that the Court set a status
2 conference or a deadline for the parties to file a status report in approximately sixty
3 (60) days, at which time the parties can advise the Court of the status of settlement,
4 if dismissal documents have not yet been filed by that time.

5 WHEREAS, based on the above, good cause exists for granting the parties'
6 stipulation.

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1 Respectfully submitted,

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3 DATED: May 20, 2025

LAW OFFICES OF DALE K. GALIPO

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5 By: /s/ Benjamin S. Levine

6 Dale K. Galipo

7 Benjamin S. Levine¹

8 *Attorneys for Plaintiffs D.S., C.S.,*
J.S., and M.S.

9 DATED: May 20, 2025

CARRAZCO LAW, A.P.C.

10
11 By: /s/ Kent M. Henderson

12 Angel Carrazco, Jr.

13 Kent M. Henderson

14 Christopher L. Holm

15 *Attorneys for Plaintiffs William Omar*

16 *Castillo Miranda, Juana Maria*

Miranda, Osmar Antonio Castillo

Blandon, Eugenia Guadalupe Espinoza

Salmeron, and Karla Vanessa Blandon

17 DATED: May 20, 2025

WOODRUFF & SMART

18
19 By: /s/ Caroline A. Byrne

20 Caroline A. Byrne

21 Brian A. Moore

22 Roberta A. Kraus

Attorneys for Defendants

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28 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.